



**U.S. Department of Justice**  
United States Attorney  
Northern District of Texas

1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699

Main 214  
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February 26, 2024

John Nicholson and Marti Morgan  
Federal Public Defender's Office, Northern District of Texas  
*VIA EMAIL*

Re: *U.S. v. Reynaldo Ortiz*, 3:22-CR-378-N

Dear John and Marti:

We have received and reviewed your letter dated February 20, 2024.

You noted that you had reviewed the fingerprint discovery we provided. We agree that the reports do not indicate that a match was made and that no fingerprint-related experts have been listed by the government. We do not know of any additional reports concerning the fingerprinting, and we do not expect to list any fingerprint experts for testimony in the government's case-in-chief. We do reserve the right to call the DPD fingerprint expert in rebuttal, if necessary.

[REDACTED]

[REDACTED]

**DEFENDANT'S  
EXHIBIT  
B  
3:22-CR-378-N**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I believe this letter has fulfilled any government obligation to provide information pursuant to *Brady*, *Giglio*, Rule 16(a)(1)(E), and the trial scheduling order.

On another topic, concerning your request for supplemental materials regarding the expert notice for Dr. Verbeck, we have transmitted your requests to Dr. Verbeck, and he has advised that the materials are not immediately available and will require some time to retrieve. Not conceding that Rule 16(e) applies to your requests, Dr. Verbeck is in the process of collecting those items for disclosure.

Finally, we have received your request for EMT records (“run sheets”) concerning Dr. K [REDACTED] and J [REDACTED] E [REDACTED]. The government does not have those in its possession.

Respectfully,

John J. de la Garza III  
Assistant United States Attorney

cc: Errin Martin  
Patrick Runkle  
Rachel Baron  
Ashley Jacques